

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

CHRISTOPHER JAMES ANDERSON,

ADAM BONA,

DYLAN BOYCE,

CHRISTIAN MASON FRANKENBERG,

JACOB WILLIAM HALLGREN,

STEVEN MCCALLIN,

RYAN DAVID MACDONELL,

MICHAEL EUGENE REESE,

TREVOR MACKENZIE THO

KEITH TRAINOR.

JONATHAN WILLIAMS

Defendants

Descendants.

Criminal No.

(Conspiracy to Distribute and Possess with Intent to Distribute Narcotics, 21 U.S.C. §§ 846, 841(a)(1); Possession with Intent to Distribute Narcotics, 21 U.S.C. § 841(a)(1); Aiding and Abetting, 18 U.S.C. § 2; Forfeiture, 21 U.S.C. § 853, Aiding and Abetting, 18 U.S.C. § 2)

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
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INDICTMENT

The Grand Jury for the District of Maryland charges:

COUNT ONE

From in or about January 2016, and continuing through April 2019, in the District of
Maryland and elsewhere,

CHRISTOPHER JAMES ANDERSON,

ADAM BONA,

DYLAN MATTHEW BOYCE,

CHRISTIAN MASON FRANKENBERG,

JACOB WILLIAM HALLGREN,

STEVEN MCCALLIN,

RYAN DAVID MACDONELL,

MICHAEL EUGENE REESE,

TREVOR MACKENZIE THOMPSON,

KEITH JOSEPH TRAINOR,

and

JONATHAN WILLIAM WALL,

the defendants herein, did knowingly and willfully combine, conspire, confederate and agree with persons known and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with the intent to distribute a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code Section 841(a) (1).

21 U.S.C. §§ 841, 846.

Quantity of Controlled Substances Involved in the Conspiracy

With respect to: **CHRISTOPHER JAMES ANDERSON, JACOB WILLIAM HALLGREN, STEVEN MCCALLIN, and JONATHAN WILLIAM WALL**, the quantity of controlled substances in the conspiracy attributable to each of them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is one thousand kilograms or more of a mixture or substance containing a detectable amount of marijuana, in violation of 21 U.S.C. § 841(b)(1)(A);

With respect to: **ADAM BONA, DYLAN MATTHEW BOYCE, CHRISTIAN MASON FRANKENBERG, RYAN DAVID MACDONELL, MICHAEL EUGENE REESE, TREVOR MACKENZIE THOMPSON, and KEITH JOSEPH TRAINOR**, the quantity of controlled substances in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is 100 kilograms or more of a mixture or substance containing a detectable amount of marijuana, in violation of 21 U.S.C. § 841(b)(1)(B)

COUNT TWO

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The Grand Jury for the District of Maryland further charges that:

On or about February 4, 2019, in the District of Maryland,

4/17/19

RYAN DAVID MACDONELL,

the defendant herein, did knowingly, intentionally, and unlawfully possess with the intent to distribute a quantity of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance; a quantity of a mixture or substance containing a detectable amount of lysergic acid diethylamide (LSD), a Schedule I controlled substance; a quantity of a mixture or substance containing a detectable amount of hashish, a Schedule I controlled substance; a quantity of a mixture or substance containing a detectable amount of hashish oil, a Schedule I controlled substance; a quantity of a mixture or substance containing a detectable amount of methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance; a quantity of a mixture or substance containing a detectable amount of psilocybin, a Schedule I controlled substance; and a quantity of a mixture or substance containing a detectable amount of ketamine, a Schedule III controlled substance.

21 U.S.C. § 841(a)(1)

18 U.S.C. § 2

COUNT THREE

The Grand Jury for the District of Maryland further charges that:

On or about February 7, 2019, in the District of Maryland,

**CHRISTOPHER JAMES ANDERSON,
and
JACOB WILLIAM HALLGREN,**

the defendants herein, did knowingly, intentionally, and unlawfully possess with the intent to distribute a quantity of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance.

21 U.S.C. § 841(a)(1)

18 U.S.C. § 2

COUNT FOUR

The Grand Jury for the District of Maryland further charges that:

On or about April 17, 2019, in the District of Maryland,

STEVEN MCCALLIN,

the defendant herein, did knowingly, intentionally, and unlawfully possess with the intent to distribute a quantity of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance; and a quantity of a mixture or substance containing a detectable amount of lysergic acid diethylamide (LSD), a Schedule I controlled substance.

21 U.S.C. § 841(a)(1)

18 U.S.C. § 2

COUNT FIVE

The Grand Jury for the District of Maryland further charges that:

On or about April 17, 2019, in the District of Maryland,

TREVOR MACKENZIE THOMPSON,

the defendant herein, did knowingly, intentionally, and unlawfully possess with the intent to distribute a quantity of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance; and a quantity of a mixture or substance containing a detectable amount of lysergic acid diethylamide (LSD), a Schedule I controlled substance.

21 U.S.C. § 841(a)(1)

18 U.S.C. § 2

COUNT SIX

The Grand Jury for the District of Maryland further charges that:

On or about April 23, 2019, in the District of Maryland,

CHRISTIAN MASON FRANKENBERG,

the defendant herein, did knowingly, intentionally, and unlawfully possess with the intent to distribute a quantity of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance.

21 U.S.C. § 841(a)(1)

18 U.S.C. § 2

COUNT SEVEN

The Grand Jury for the District of Maryland further charges that:

On or about ~~April 29, 2019~~, in the District of Maryland,

 **ADAM BONA,**

4/17/19

SIGNATURE REDACTED

the defendant herein, did knowingly, intentionally, and unlawfully possess with the intent to distribute a quantity of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance.

21 U.S.C. § 841(a)(1)

18 U.S.C. § 2

FORFEITURE

The Grand Jury further finds that:

Pursuant to Title 21 U.S.C. § 853(a), upon conviction of one or more of the Counts in this Indictment, each defendant shall forfeit to the United States of America:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation, and
- b. any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation;

including, but not limited to:

- a sum of money in the amount of \$1,246,121.00, and
- a 2012 VW Golf "R" VIN # WVWRF7AJ5CW310782.

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c) up to the value of \$1,246,121.00.

SIGNATURE REDACTED

10/22/19

21 U.S.C. §853(a)
21 U.S.C. §2461(c)
Fed. R. Crim. P. 32.2.(a)

Robert K. Hur

Robert K. Hur
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Foreperson

Date: 10/22/19